

EXHIBIT 4

From: [Konkoly, Antonia \(CIV\)](#)
To: ["Gadeir Abbas"; Roth, Dena M. \(CIV\); Carolyn Homer; Lena F. Masri, Esq.](#)
Cc: [Powell, Amy \(CIV\); Healy, Christopher \(CIV\)](#)
Subject: RE: Elhady - order on ORI list
Date: Tuesday, February 26, 2019 11:21:00 PM

Gadeir –

As we have mentioned at various points, defendants believe it is important to have clear rules in place governing the use of any information plaintiffs learn through their viewing of the ORI list. You have agreed with the principle that “clear expectations” are necessary, and on our Monday morning call, we understood you to represent that you were at least broadly in agreement with the terms we proposed in the attached protective order (excepting the issue about the writing down of entity names, that has since been resolved).

Accordingly, I am re-forwarding our proposed PO for your (re)consideration. We are open to discussion, but if we cannot come to an agreement in the next few days, we’ll need to file a motion on Friday in order to have the motion heard, and a PO entered, before the SJ briefs come due. We’d appreciate your prompt attention to this matter, and add this to list of topics we need to discuss tomorrow.

Thanks,
Toni

From: Gadeir Abbas <gAbbas@cair.com>
Sent: Friday, February 22, 2019 5:40 PM
To: Roth, Dena M. (CIV) <droth@CIV.USDOJ.GOV>; Carolyn Homer <cHomer@cair.com>; Lena F. Masri, Esq. <lmasri@cair.com>
Cc: Powell, Amy (CIV) <apowell@CIV.USDOJ.GOV>; Konkoly, Antonia (CIV) <ankonkol@CIV.USDOJ.GOV>; Healy, Christopher (CIV) <chhealy@CIV.USDOJ.GOV>
Subject: Re: Elhady - order on ORI list

Thanks Dena.

We'll get back to you tomorrow after we've had a chance to consider your proposal. But we agree that it is important for the parties to establish clear expectations.

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From: Roth, Dena M. (CIV) <Dena.M.Roth@usdoj.gov>

Sent: Friday, February 22, 2019 4:36:52 PM

To: Gadeir Abbas; Carolyn Homer; Lena F. Masri, Esq.

Cc: Powell, Amy (CIV); Konkoly, Antonia (CIV); Healy, Christopher (CIV)

Subject: Elhady - order on ORI list

Gadeir –

In light of the Magistrate's order that the ORI List be restricted to viewing by Plaintiffs' counsel of record, with no copies permissible, we thought it would be useful for both parties to clarify the scope of that verbal protective order and how plaintiffs' counsel may use the information gleaned.

We were hoping we could just agree on some language to propose to the Court. Here's a draft – we're happy to discuss but we would love to get this on the docket ASAP for the Court's consideration.

Re: logistics – please advise if you are able to come to our offices at 1100 L Street NW in the afternoon on Monday, who will be coming, and what times work best for you.

(I will be offline the rest of the day today through tomorrow, so please reply all to the group)

Dena

Dena M. Roth
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